

EXECUTIVE SUMMARY - ENFORCEMENT MATTER
DOCKET NO.: 2006-1990-AIR-E TCEQ ID: RN102843547 CASE NO.: 31747
RESPONDENT NAME: Army & Air Force Exchange Service

Page 1 of 2

ORDER TYPE:		
<input checked="" type="checkbox"/> 1660 AGREED ORDER	<input type="checkbox"/> FINDINGS AGREED ORDER	<input type="checkbox"/> FINDINGS ORDER FOLLOWING SOAH HEARING
<input type="checkbox"/> FINDINGS DEFAULT ORDER	<input type="checkbox"/> SHUTDOWN ORDER	<input type="checkbox"/> IMMINENT AND SUBSTANTIAL ENDANGERMENT ORDER
<input type="checkbox"/> AMENDED ORDER	<input type="checkbox"/> EMERGENCY ORDER	
CASE TYPE:		
<input checked="" type="checkbox"/> AIR	<input type="checkbox"/> MULTI-MEDIA (check all that apply)	<input type="checkbox"/> INDUSTRIAL AND HAZARDOUS WASTE
<input type="checkbox"/> PUBLIC WATER SUPPLY	<input type="checkbox"/> PETROLEUM STORAGE TANKS	<input type="checkbox"/> OCCUPATIONAL CERTIFICATION
<input type="checkbox"/> WATER QUALITY	<input type="checkbox"/> SEWAGE SLUDGE	<input type="checkbox"/> UNDERGROUND INJECTION CONTROL
<input type="checkbox"/> MUNICIPAL SOLID WASTE	<input type="checkbox"/> RADIOACTIVE WASTE	<input type="checkbox"/> DRY CLEANER REGISTRATION
<p>SITE WHERE VIOLATION(S) OCCURRED: Fort Bliss – AAFES, located at Building 199 Cassidy Road, Fort Bliss, El Paso County</p> <p>TYPE OF OPERATION: Convenience store with retail sales of gasoline</p> <p>SMALL BUSINESS: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>OTHER SIGNIFICANT MATTERS: There are no complaints. There is no record of additional pending enforcement actions regarding this facility location.</p> <p>INTERESTED PARTIES: No one other than the ED and the Respondent has expressed an interest in this matter.</p> <p>COMMENTS RECEIVED: The <i>Texas Register</i> comment period expired on April 30, 2007. No comments were received.</p> <p>CONTACTS AND MAILING LIST: TCEQ Attorney/SEP Coordinator: None TCEQ Enforcement Coordinator: Ms. Libby Hogue, Enforcement Division, Enforcement Section II, MC 149, (512) 239-1165; Mr. Steven Lopez, Enforcement Division, MC 219, (512) 239-1896 Respondent: Mr. John R. Sharp, General Manager, Army & Air Force Exchange Service, P.O. Box 16111, Fort Bliss, Texas 79906 Respondent's Attorney: Not represented by counsel on this enforcement matter</p>		

DOCKET NO.: 2006-1990-AIR-E

VIOLATION SUMMARY CHART:

VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
Type of Investigation: <input type="checkbox"/> Complaint <input checked="" type="checkbox"/> Routine <input type="checkbox"/> Enforcement Follow-up <input type="checkbox"/> Records Review Date(s) of Complaints Relating to this Case: None Date of Investigation Relating to this Case: October 3, 2006 Date of NOE Relating to this Case: October 10, 2006(NOE) Background Facts: This was a routine investigation. AIR Alleged to have supplied, sold, or dispensed gasoline for use as motor vehicle fuel in El Paso County without the minimum oxygen content of 2.7% by weight [30 TEX. ADMIN. CODE § 114.100(a) and TEX. HEALTH & SAFETY CODE § 382.085(b)].	Total Assessed: \$2,200 Total Deferred: \$440 <input checked="" type="checkbox"/> Expedited Settlement <input type="checkbox"/> Financial Inability to Pay SEP Conditional Offset: \$0 Total Paid to General Revenue: \$1,760 Site Compliance History Classification <input type="checkbox"/> High <input checked="" type="checkbox"/> Average <input type="checkbox"/> Poor Person Compliance History Classification <input type="checkbox"/> High <input checked="" type="checkbox"/> Average <input type="checkbox"/> Poor Major Source: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Applicable Penalty Policy: September 2002	Corrective Actions Taken: The Executive Director recognizes that the Army & Air Force Exchange Service's regular and mid-grade gasoline were tested on November 20, 2006 and contained a minimum of 2.7% oxygen by weight.



Penalty Calculation Worksheet (PCW)

Policy Revision 2 (September 2002)

PCW Revision November 15, 2006

TCEQ

DATES	Assigned	13-Nov-2006	Screening	14-Nov-2006	EPA Due	
	PCW	15-Nov-2006				

RESPONDENT/FACILITY INFORMATION

Respondent	Army & Air Force Exchange Service		
Reg. Ent. Ref. No.	RN102843547		
Facility/Site Region	6-El Paso	Major/Minor Source	Minor

CASE INFORMATION

Enf./Case ID No.	31747	No. of Violations	1	
Docket No.	2006-1990-AIR-E	Order Type	1660	
Media Program(s)	Air Quality	Enf. Coordinator	Libby Hogue	
Multi-Media		EC's Team	Team 4	
Admin. Penalty \$	Limit Minimum	\$0	Maximum	\$10,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties) **Subtotal 1** \$2,000

ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History 20% Enhancement **Subtotals 2, 3, & 7** \$400

Notes

A 20% enhancement is recommended due to having one agreed final enforcement order with denial of liability.

Culpability

No

0% Enhancement

Subtotal 4 \$0

Notes

Respondent does not meet the culpability criteria.

Good Faith Effort to Comply

10% Reduction

Subtotal 5 \$200

Before NOV NOV to EDPRP/Settlement Offer

Extraordinary

Ordinary

N/A

X

(mark with x)

Notes

Respondent came into compliance on November 20, 2006, after the Notice of Enforcement was issued.

0% Enhancement*

Subtotal 6 \$0

Total EB Amounts
Approx. Cost of Compliance

\$105

\$100

*Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7

Final Subtotal \$2,200

OTHER FACTORS AS JUSTICE MAY REQUIRE

Adjustment \$0

Reduces or enhances the Final Subtotal by the indicated percentage. (Enter number only; e.g. -30 for -30%.)

Notes

Final Penalty Amount \$2,200

STATUTORY LIMIT ADJUSTMENT

Final Assessed Penalty \$2,200

DEFERRAL

20%

Reduction

Adjustment -\$440

Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes

Deferral offered for expedited settlement.

PAYABLE PENALTY

\$1,760

Screening Date 14-Nov-2006

Docket No. 2006-1990-AIR-E

PCW

Respondent Army & Air Force Exchange Service

Policy Revision 2 (September 2002)

Case ID No. 31747

PCW Revision November 15, 2006

Reg. Ent. Reference No. RN102843547

Media [Statute] Air Quality

Enf. Coordinator Libby Hogue

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written NOVs with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	0	0%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	1	20%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	0	0%
Please Enter Yes or No			
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 20%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Average Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

A 20% enhancement is recommended due to having one agreed final enforcement order with denial of liability.

Total Adjustment Percentage (Subtotals 2, 3, & 7) 20%

Screening Date 14-Nov-2006

Docket No. 2006-1990-AIR-E

PCW

Respondent Army & Air Force Exchange Service

Policy Revision 2 (September 2002)

Case ID No. 31747

PCW Revision November 15, 2006

Reg. Ent. Reference No. RN102843547

Media [Statute] Air Quality

Enf. Coordinator Libby Hogue

Violation Number 1

Rule Cite(s) 30 Tex. Admin. Code § 114.100(a) and Tex. Health & Safety Code § 382.085(b)

Violation Description Failed to ensure the gasoline sold as motor vehicle fuel in El Paso County, during the control period of October 1, 2006 through March 31, 2007, contained a minimum of 2.7% oxygen by weight. Specifically, lab results on gasoline sampled by the TCEQ on October 3, 2006, indicated the oxygen content to be 2.13% by weight for the regular gasoline and 1.92% by weight for mid-grade gasoline.

Base Penalty \$10,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			x
Potential			

Percent 10%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0%

Matrix Notes

Human health or the environment have been exposed to insignificant amounts of pollutants that do not exceed levels protective of human health and the environment.

Adjustment \$9,000

\$1,000

Violation Events

Number of Violation Events 2

44 Number of violation days

mark only one with an x	daily	
	monthly	
	quarterly	
	semiannual	
	annual	
	single event	x

Violation Base Penalty \$2,000

Two single events are recommended. One event per each grade of gasoline.

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$105

Violation Final Penalty Total \$2,200

This violation Final Assessed Penalty (adjusted for limits) \$2,200

Economic Benefit Worksheet

Respondent: Army & Air Force Exchange Service
 Case ID No: 31747
 Reg. Ent. Reference No: RN102843547
 Media: Air Quality
 Violation No: 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
<small>No commas or \$</small>							

Delayed Costs

Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)				0.0	\$0	n/a	\$0

Notes for DELAYED costs

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
	\$100	1-Oct-2006	20-Nov-2006	1.1	\$5	\$100	\$105

Notes for AVOIDED costs

This amount represents the estimated cost of providing sufficient oversight to ensure that fuel sold met the 2.7% by weight oxygen content.

Approx. Cost of Compliance

\$100

TOTAL

\$105

Compliance History

Customer/Respondent/Owner-Operator:	CN600804611	Army & Air Force Exchange Service	Classification: AVERAGE	Rating: 4.44
Regulated Entity:	RN102843547	FORT BLISS - AAFES	Classification: AVERAGE	Site Rating: 9.00

ID Number(s):	PETROLEUM STORAGE TANK REGISTRATION	REGISTRATION	EE1213R
	PETROLEUM STORAGE TANK REGISTRATION	REGISTRATION	5147

Location:	AIR NEW SOURCE PERMITS BLDG 199 CASSIDY ROAD, FORT BLISS, TX, 79916	ACCOUNT NUMBER	EE1213R
		Rating Date: 9/1/2006	Repeat Violator: NO

TCEQ Region: REGION 06 - EL PASO

Date Compliance History Prepared: November 14, 2006

Agency Decision Requiring Compliance History: Enforcement

Compliance Period: November 13, 2001 to November 13, 2006

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Libby Hogue Phone: 512-239-1165

Site Compliance History Components

- | | |
|--|------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | Yes |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | No |
| 3. If Yes, who is the current owner? | <u>N/A</u> |
| 4. If Yes, who was/were the prior owner(s)? | <u>N/A</u> |
| 5. When did the change(s) in ownership occur? | <u>N/A</u> |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A	Effective Date: 11/22/2002	ADMINORDER 2001-0237-AIR-E
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Classification: Moderate

Citation: 30 TAC Chapter 114, SubChapter D 114.100(a)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to meet the minimum oxygen content of 2.7% by weight when supplying, selling or dispensing gasoline for use as motor vehicle fuel in El Paso County.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter C 115.252(2)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Allowed the transfer of gasoline which may ultimately be used in a motor vehicle in the El Paso area with a Reid Vapor pressure greater than 7.0 pounds per square inch absolute.

- B. Any criminal convictions of the state of Texas and the federal government.

N/A

- C. Chronic excessive emissions events.

N/A

- D. The approval dates of investigations. (CCEDS Inv. Track. No.)

1	07/22/2003	(144804)
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N/A

2	06/17/2005	(396478)
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3	11/30/2005	(438866)
---	------------	----------

4	10/30/2003	(253049)
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5	07/07/2003	(120039)
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6	03/15/2002	(121239)
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7	11/19/2002	(14203)
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8	08/03/2004	(287229)
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9	03/22/2003	(10354)
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10	11/10/2006	(517911)
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11	09/07/2002	(10187)
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- E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

N/A

- F. Environmental audits.

N/A

G. Type of environmental management systems (EMSs).

N/A

H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



**IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
ARMY & AIR FORCE EXCHANGE
SERVICE
RN102843547**

§ **BEFORE THE**
§
§ **TEXAS COMMISSION ON**
§
§ **ENVIRONMENTAL QUALITY**

AGREED ORDER DOCKET NO. 2006-1990-AIR-E

I. JURISDICTION AND STIPULATIONS

At its _____ agenda, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Army & Air Force Exchange Service under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and Army & Air Force Exchange Service appear before the Commission and together stipulate that:

1. Army & Air Force Exchange Service owns and operates a convenience store with retail gasoline sales located at Building 199 Cassidy Road, in Fort Bliss, El Paso County, Texas (the "Store").
2. The Store consists of one or more sources as defined in Tex. Health & Safety Code § 382.003(12).
3. The Commission and Army & Air Force Exchange Service agree that the Commission has jurisdiction to enter this Agreed Order, and that Army & Air Force Exchange Service is subject to the Commission's jurisdiction.
4. Army & Air Force Exchange Service received notice of the violations alleged in Section II ("Allegations") on or about October 15, 2006.
5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by Army & Air Force Exchange Service of any violation alleged in Section II ("Allegations"), nor of any statute or rule.

6. An administrative fee in the amount of Two Thousand Two Hundred Dollars (\$2,200) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). Army & Air Force Exchange Service has paid One Thousand Seven Hundred Sixty Dollars (\$1,760) of the administrative fee and Four Hundred Forty Dollars (\$440) is deferred.
7. Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.
8. The Executive Director of the TCEQ and Army & Air Force Exchange Service have agreed on a settlement of the matters alleged in this enforcement action, subject to the approval of the Commission.
9. The Executive Director recognizes that the Army & Air Force Exchange Service's regular and mid-grade gasoline were tested on November 20, 2006 and contained a minimum of 2.7% oxygen by weight.
10. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
11. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

II. ALLEGATIONS

During an inspection on October 3, 2006, an El Paso City-County Health and Environmental District Air Quality Program investigator documented that the Army & Air Force Exchange Service, as owner and operator of the Store, is alleged to have violated 30 TEX. ADMIN. CODE § 114.100(a) and TEX. HEALTH & SAFETY CODE § 382.085(b) by supplying, selling or dispensing gasoline for use as motor vehicle fuel in El Paso County without the minimum oxygen content of 2.7% by weight.

III. DENIALS

Army & Air Force Exchange Service generally denies each allegation in Section II ("Allegations").

IV. ORDER

1. It is, therefore, ordered by the TCEQ that Army & Air Force Exchange Service pay administrative fees as set forth in Section I, Paragraph 6 above. The payment of these administrative fees and Army & Air Force Exchange Service's compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from considering requiring corrective action or penalties for violations, which are not raised here. Administrative fee payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Army & Air Force Exchange Service, Docket No. 2006-1990-AIR-E" to:

Financial Administration Division, Revenues Section
Attention: Cashier's Office, MC 214
Texas Commission on Environmental Quality
P.O. Box 13088
Austin, Texas 78711-3088

2. The provisions of this Agreed Order shall apply to and be binding upon Army & Air Force Exchange Service. Army & Air Force Exchange Service is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the operations referenced in this Agreed Order.
3. This Agreed Order, issued by the Commission, shall not be admissible against Army & Air Force Exchange Service in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
4. This agreement may be executed in multiple counterparts, which together shall constitute a single original instrument. Any executed signature page to this Agreement may be transmitted by facsimile transmission to the other parties, which shall constitute an original signature for all purposes.
5. Under 30 TEX. ADMIN. CODE § 70.10(b), the effective date is the date of hand-delivery of the Order to Army & Air Force Exchange Service, or three days after the date on which the Commission mails notice of the Order to Army & Air Force Exchange Service, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

For the Executive Director

6/28/07
Date

I, the undersigned, have read and understand the attached Agreed Order. I am authorized to agree to the attached Agreed Order on behalf of the entity, if any, indicated below my signature, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the fee amount, is materially relying on such representation.

I also understand that my failure to comply with the Order, if any, in this order and/or my failure to timely pay the fee amount, may result in:

- A negative impact on my compliance history;
- Greater scrutiny of any permit applications submitted by me;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fee, or to a collection agency;
- Increased penalties in any future enforcement actions against me;
- Automatic referral to the Attorney General's Office of any future enforcement actions against me; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

John R. Sharp
Signature

20 Feb 2007
Date

John R. Sharp
Name (Printed or typed)
Authorized Representative of
Army & Air Force Exchange Service

General Manager
Title

Instructions: Send the original, signed Agreed Order with fee payment to the Financial Administration Division, Revenues Section at the address in Section IV, Paragraph 1 of this Agreed Order.

THE UNIVERSITY OF CHICAGO PRESS
54 EAST LAKE STREET, CHICAGO, ILL. 60601-3043
TEL: 312/937-1234 FAX: 312/937-1234

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